

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

JOANN INC., *et al.*,

Debtors.

Chapter 11

Case Nos. 25-10068 (CTG), *et seq.*
(Jointly Administered)

Hearing Date: April 3, 2025, 1:00 PM
Objections Due By: March 17, 2025

NOTICE OF MOTION

TO: Parties listed on the Certificate of Service

Kathleen Nowak (“Movant”) has filed a Motion for Relief From The Automatic Stay (the “Motion”), which seeks the following relief: Relief from the automatic stay to commence and prosecute litigation under applicable non-bankruptcy law against one or more of the above-captioned debtors for claims arising from an accident occurring in the Debtors’ store located in Sterling Heights, MI on December 31, 2024, including but not limited to pursuing available insurance proceeds.

HEARING ON THE MOTION WILL BE HELD ON APRIL 3, 2025 AT 1:00 P.M. PREVAILING EASTERN TIME.

You are required to file a response, if any, on or before March 17 at 4:00 P.M. Prevailing Eastern Time. At the same time, you must also serve a copy of the response upon Movant’s attorney:

Adam Hiller, Esquire
Hiller Law, LLC
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

John J. Cibrario, Esquire
Law Offices Of John J. Cibrario
1150 Atlantic #556
Milford, Michigan 48381
(734)721-1210 telephone
cibrario@prodigy.net

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE,
THE RELIEF REQUESTED IN THE MOTION MAY BE GRANTED BY THE
COURT WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 28, 2025
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

Adam Hiller (DE No. 4105)
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

-and-

John J. Cibrario, Esquire
Law Offices Of John J. Cibrario
1150 Atlantic #556
Milford, Michigan 48381
(734)721-1210 telephone
cibrario@prodigy.net

Attorneys for Movant, Kathleen Nowak